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ORIGINAL

April 19, 2001

Arizona Corporation Commission

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AZ CORP COMMISSION
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Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Re: Docket No. T-00000A-97-0238

To the Commission:

Enclosed for filing with the Arizona Corporation Commission, please find an original and fifteen (15) copies of Comments regarding outstanding PAP issues in conjunction with the above-referenced proceeding.

Please date-stamp the additional copy, and return it to me in the enclosed self-addressed, stamped envelope.

Respectfully submitted,

Michael B. Hazzard
Counsel to Z-Tel Telecommunications, Inc.

Attachments

cc: Service List

**BEFORE THE
ARIZONA CORPORATION COMMISSION**

CARL J. KUNASEK

Chairman

JAMES M. IRVIN

Commissioner

WILLIAM A. MUNDELL

Commissioner

In the Matter of US West
Communications, Inc.'s
Compliance with Section 271 of the
Telecommunications Act of 1996

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Docket No. T-00000A-97-0238

**Z-TEL COMMUNICATIONS INC.'S COMMENTS REGARDING OUTSTANDING PAP
ISSUES**

Z-Tel Communications, Inc. ("Z-Tel"), by its attorneys, hereby submits these Comments
In response to the Comments Regarding Outstanding PAP Issues filed by Qwest in the above-
captioned proceeding at its Final Workshop on April 2, 2001.

GENERAL COMMENTS

The Arizona Corporation Commission ("Commission") has requested during its
Final Workshop in the above-captioned proceeding that participants respond to Comments filed
by Qwest with regard to three (3) remaining issues: PAP-2 Change Management Measurement,
PAP-3 Root Cause Analysis and PAP-11 Audits.

Z-Tel respectfully submits that after a careful read of Qwest's most recently filed
Comments, no new issues have been set forth that would cause Z-Tel to alter its previously
stated position. Z-Tel has clearly stated its position within all of its previously filed Comments

and numerous Exhibits. Z-Tel further believes that it has reached an impasse with Qwest on the remaining issues, since Qwest's submitted proposal at this time does not meet its needs for a reasonable performance assurance plan for the State of Arizona.

Since Z-Tel believes it has previously sufficiently set forth its position, no further Comments will be filed at this time. Z-Tel will address all remaining issues which proceed to the hearing scheduled in this Docket

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Hazzard', with a long horizontal flourish extending to the right.

Jonathan E. Canis

Michael B. Hazzard.

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Counsel To Z-Tel Communications, Inc.

Dated: April 18, 2001

CERTIFICATE OF SERVICE

I, Charles M. Hines III, hereby certify that a true and correct copy of the foregoing "**Comments Regarding Outstanding PAP Issues; AZ Docket No. T-00000A-97-0238**" was delivered by overnight delivery or first-class mail this 19th day of April, 2001 to the individuals on the following list:

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A handwritten signature in dark ink, appearing to read "Charles M. Hines III", written over a horizontal line.

Charles M. Hines III